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March 20, 2023

Re: *United States v. Alice Chu*
19 Cr 678

Hon. William Martini
United States District Judge
United States Courthouse
50 Walnut Street
Newark, New Jersey

Dear Judge Martini:

I represent Alice Chu in the above matter. Dr. Chu is scheduled to surrender to the Bureau of Prisons on March 23, 2023 to begin her sentence of 21 months incarceration. For the reasons stated herein, I request the Court grant Dr. Chu a 30-day stay of her surrender date, or to such date 30 days after this Court renders a decision on the pending objections to the restitution and forfeiture orders before this Court (whichever is later).

Dr. Chu has submitted to the Court through counsel objections to the Government's proposed orders of restitution and forfeiture based upon our contention that the proposed orders assume that no treatment provided by Dr. Chu was medically appropriate or was only the product of fraud. We have submitted sworn statements of medical providers which claim otherwise, and which we believe establishes a question of fact for this Court to consider. To that end, as Dr. Chu would be a material witness at any fact finding, we request that this Court stay her date of surrender so that she may be able to testify and to be cross-examined (if the Government so chooses).

I have inquired of the Government for its position on this application, and the Government objects to this application.

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February 21, 2023
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I thank the Court for its consideration of this request. If there are any questions, please do not hesitate to contact me.

Very truly yours,

Sam Braverman

Samuel M. Braverman, Esq.
Co-Chair
Government Enforcement,
Internal Investigations, and
White-Collar Defense Group

Cc: All Parties by ECF